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10  
11 *Attorneys for Plaintiffs*

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13 IN THE UNITED STATES DISTRICT COURT  
14  
SOUTHERN DISTRICT OF CALIFORNIA

15 SAMBREEL HOLDINGS LLC; YONTOO LLC;  
16 and THEME YOUR WORLD LLC,

17 Plaintiffs,

18 vs.

19 FACEBOOK, INC.,

20 Defendant.

Case No. 3:12-CV-00668-W-KSC

**DECLARATION OF ANDREW SULLIVAN  
IN SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION**

Hon. Thomas J. Whelan

Hearing Date: April 23, 2012  
Hearing Time: 10:00 a.m.  
Dept: Courtroom 7

21  
22 **DECLARATION OF ANDREW SULLIVAN**

23 I, Andrew Sullivan, declare as follows:

24 1. I am the President and Chief Executive Officer of Jeetyet Media, which is a subsidiary of  
25 Sambrel Holdings LLC (“Sambrel”). My primary responsibility is to interact with the entities that  
26 purchase advertising from Sambrel.

27 2. Beginning in July 2011, I began to hear that Facebook was approaching Sambrel’s

1 advertising partners. These advertising partners informed me that Facebook asserted that advertising  
2 with PageRage was a violation of Facebook's policies. Facebook told these firms that they would not be  
3 allowed to continue to work with Facebook or the applications that operate on Facebook if they  
4 continued to do business with PageRage.

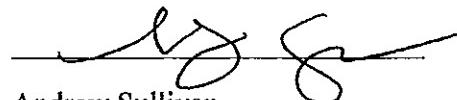
5 3. Between August and November 2011, seven of Sambrell's advertising partners stopped  
6 doing business with PageRage. These entities are Rubicon Project, AdMeld, OpenX, Advertising.com,  
7 LifeStreet, SayMedia, and Microsoft Media Network. Before Facebook's interference, purchases made  
8 or brokered by these entities represented more than 80 percent of the advertising revenue for PageRage.

9 4. I am aware of three of Sambrell's advertising partners who would not agree to  
10 Facebook's demands – ValueClick, Underdog, and CPX. These entities have been removed from  
11 Facebook's list of approved advertisers for developers on the Facebook Platform.

12 5. Exhibit 18 to Sambrell's Notice of Lodgment is a true and correct copy of an e-mail I  
13 received from Todd Rosenberg at OpenX on November 23, 2011.

14 I declare, under penalty of perjury, that the foregoing is true and correct to the best of my  
15 knowledge.

16 Executed this 16th day of March 2012, at Carlsbad, California.

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21 Andrew Sullivan  
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